

## **OFFICE OF THE DISTRICT ATTORNEY, Bronx County**

**DARCEL D. CLARK**District Attorney

198 East 161st Street Bronx, New York 10451 (718) 838-6285 Fax (718) 590-6523

August 1, 2022

Honorable Gabriel W. Gorenstein United States Magistrate Judge United States Courthouse Southern District of New York 500 Pearl Street New York, New York 10007

RE: <u>Gumbs v. Stanford</u>

1:22-cv-04659-VEC-GWG

## Dear Judge Gorenstein:

My Office represents the Respondent in the above-entitled proceeding, and pursuant to the Order dated June 8, 2022, our response to petitioner's petition pursuant to 28 U.S.C § 2254 is currently due on August 8, 2022. I am writing to respectfully request that respondent's time to answer the petition be extended two weeks, until **August 22, 2022.** No previous request for an extension has been made. Petitioner's attorney, David Bernstein, Esq., has consented to this request.

I respectfully request this extension due to my press of work. Since receiving this assignment, I have filed one respondent's brief in the Appellate Division, First Department, and I have been working on two additional respondent's briefs, both currently due in the Appellate Division, First Department, on August 10, 2022. In addition, I filed two motion responses in Supreme Court, Bronx County. Furthermore, I have been finalizing several additional matters, as I am preparing to be out on leave at the end of this month.

Thank you for your consideration in this matter. If I can provide any additional information, please contact me by phone at 718-838-6285 or by e-mail at kublinb@bronxda.nyc.gov.

Respectfully,

cc: David Bernstein, Esq.
Office of the Appellate Defender
11 Park Place RM 1601
New York, New York 10007

Beth R. Kublin
Bronx County District Attorney
Assistant District Attorney
198 East 161st Street
Bronx, New York 10451
kublinb@bronxda.nyc.gov